

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

WESTFIELD INSURANCE COMPANY)	
)	
)	
<i>Plaintiff,</i>)	
)	
-vs-)	
)	
MAXIM CONSTRUCTION CORPORATION, INC.)	No. 15 cv 9358
and the CITY OF CRYSTAL LAKE,)	
)	
)	
<i>Defendants.</i>)	

WESTFIELD'S MOTION FOR SUMMARY JUDGMENT

Now comes the Plaintiff/Counterdefendant, Westfield Insurance Company, by and through its attorneys, David S. Osborne and Lauren E. Rafferty of Lindsay, Pickett Rappaport & Postel, LLC, and hereby moves this Honorable Court to enter Summary Judgment in its favor and against Defendant/Counterplaintiff Maxim Construction Corporation, Inc. on all claims, counterclaims and affirmative defenses at issue in this case. In support hereof, Westfield submits its Memorandum of Law and Statement of Undisputed Material Facts, leave for which to file is sought contemporaneously herewith.

Respectfully submitted,
LINDSAY, PICKETT, RAPPAPORT & POSTEL,
LLC

David. S. Osborne
Lauren E. Rafferty
LINDSAY, PICKETT, RAPPAPORT &
POSTEL, LLC
10 S. LaSalle St., Suite 1301
Chicago, Illinois 60603
Tel: (312) 995-7903
Fax: (312) 629-1404
dosborne@lprp-law.com
lrafferty@lprp-law.com
*Attorneys for Plaintiff/Counterdefendant
Westfield Insurance Company*

By: /s/ David S. Osborne

CERTIFICATE OF SERVICE

I, *David S. Osborne*, certify that on **May 5, 2017**, I electronically filed *Westfield's Motion for Summary Judgment* with the Clerk of the Court using the CM/ECF system, which served a copy of the foregoing upon counsel of record.

By: /s/ David S. Osborne